

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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PANGEA CAPITAL MANAGEMENT, LLC,	:	Case No.: 1:16-cv-00840-LAK
	:	
Petitioner,	:	Hon. Lewis A. Kaplan
	:	
-against-	:	Document Filed Electronically
	:	
JOHN R. LAKIAN,	:	
	:	
Respondent.	:	
-----	X	

DECLARATION OF STEVEN J. HYMAN

STEVEN J. HYMAN hereby declares, under penalty of perjury, as follows:

1. I am a partner in the law firm of McLaughlin & Stern, LLP, attorneys for respondent John R. Lakian (“Lakian” or “Respondent”) in the above-captioned proceeding. I submit this declaration in connection with Lakian’s opposition to the Petition to Confirm Arbitration Award (the “Petition”) filed in this proceeding by petitioner Pangea Capital Management, LLC and in support of Lakian’s Motion to Vacate or Modify Arbitration Award (the “Motion”).

2. Annexed hereto as **Exhibit A** is a true copy of the Summons and Verified Complaint filed on June 7, 2012 in the action captioned *Mark Branigan, et al. v. John R. Lakian, et al.*, Index No. 651975/2012 (Sup. Ct., N.Y. Cty.).

3. Annexed hereto as **Exhibit B** is a true copy of the Statement of Claim dated November 13, 2012, which was filed in the relevant arbitration on behalf of Pangea and Mark Branigan (excluding the voluminous exhibits).

4. Annexed hereto as **Exhibit C** is a true copy of a letter dated February 5, 2013 from Richard E. Carmen, Esq. to the Honorable Stephen G. Crane, J.A.D. (Ret.) (“Arbitrator Crane”).

5. Annexed hereto as **Exhibit D** is a true copy of a letter dated February 6, 2013 from Caitlin L. Bronner, Esq. to Arbitrator Crane.

6. Annexed hereto as **Exhibit E** are true copies of relevant excerpts from Mark Branigan and Pangea Capital Management, LLC's Post-Hearing Submission dated March 3, 2015.

7. Annexed hereto as **Exhibit F** are true copies of relevant excerpts from Mark Branigan and Pangea Capital Management, LLC's Supplemental Post-Hearing Submission dated May 4, 2015.

8. Annexed hereto as **Exhibit G** is a true copy of a letter dated January 11, 2016 from Richard E. Carmen, Esq. to Arbitrator Crane.

9. Annexed hereto as **Exhibit H** is a true copy of the Amended and Restated Limited Liability Company Agreement of Pangea Capital Management, LLC dated September 22, 2009.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: New York, New York
April 14, 2016

/s/ Steven J. Hyman

STEVEN J. HYMAN

INDEX OF EXHIBITS

EXHIBIT

Summons and Verified Complaint dated June 7, 2012 in <i>Mark Branigan, et al.</i> <i>v. John R. Lakian, et al.</i> , Index No. 651975/2012 (Sup. Ct., N.Y. Cty.)	A
Statement of Claim dated November 13, 2012 (without exhibits)	B
Letter dated February 5, 2013 from Richard E. Carmen, Esq. to Arbitrator Crane.....	C
Letter dated February 6, 2013 from Caitlin L. Bronner, Esq. to Arbitrator Crane	D
Excerpts from Mark Branigan and Pangea Capital Management, LLC's Post-Hearing Submission dated March 3, 2015.....	E
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